

**KELLER BENVENUTTI KIM LLP**  
JANE KIM (Cal. Bar No. 298192)  
(jkim@kbbkllp.com)  
JEREMY V. RICHARDS (Cal. Bar No. 102300)  
(jrichards@kbbkllp.com)  
425 Market Street, 26th Floor  
San Francisco, California 94105  
Telephone: (415) 496-6723  
Facsimile: (650) 636-9251

*Proposed Attorneys for Debtors and  
Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

TRINITAS ADVANTAGED  
AGRICULTURE PARTNERS IV, LP *et al.*,<sup>1</sup>  
Debtors.

Case No. 24-50211 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**NOTICE OF HEARING ON  
DEBTORS' MOTION FOR ORDERS  
(I)(A) AUTHORIZING AND  
APPROVING BID PROCEDURES, (B)  
APPROVING PROCEDURES  
RELATED TO THE ASSUMPTION  
OF CERTAIN EXECUTORY  
CONTRACTS AND UNEXPIRED  
LEASES, (C) APPROVING THE  
NOTICE PROCEDURES, (D)  
AUTHORIZING ENTRY INTO ONE  
OR MORE STALKING HORSE  
AGREEMENTS, AND (E) SETTING A  
DATE FOR THE SALE HEARING;  
AND (II) AUTHORIZING AND  
APPROVING (A) THE SALE OF  
CERTAIN ASSETS FREE AND  
CLEAR OF ALL LIENS, CLAIMS,**

<sup>1</sup> The last four digits of Trinitas Advantaged Agriculture Partners IV, LP's tax identification number are 3730. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://www.donlinrecano.com/trinitas>. The Debtors' service address is 2055 Woodside Road, Suite 195, Redwood City, CA 94061.

**ENCUMBRANCES AND INTERESTS,  
(B) THE ASSUMPTION AND  
ASSIGNMENT OF CERTAIN  
CONTRACTS, AND (C) PAYMENT  
OF BID PROTECTIONS, IF  
APPLICABLE**

Date: April 26, 2024  
Time: 10:00 a.m. (Pacific Time)  
Place: **Tele/Videoconference**  
**Appearances Only**  
United States Bankruptcy Court  
450 Golden Gate Avenue  
Courtroom 17, 16th Floor  
San Francisco, CA 94102

**TO: THE UNITED STATES BANKRUPTCY COURT, THE OFFICE OF THE UNITED STATES TRUSTEE, AND OTHER PARTIES IN INTEREST:**

**PLEASE TAKE NOTICE** that on February 19, 2024 (the “Petition Date”), Trinitas Advantaged Agriculture Partners IV, LP; Trinitas Farming, LLC; Dixon East LLC; Turf Ranch LLC; Rasmussen LLC; Johl LLC; Chiala LLC; Hall Ranch LLC; Dinuba Ranch, LLC; Porterville LLC; Tule River Ranch, LLC; Jeffrey Ranch, LLC; Toor Ranch, LLC; Lamb Ranch, LLC; Fry Road, LLC; Adobe Ranch, LLC; Marcucci Ranch, LLC; Ratto Ranch, LLC; and Phelps Ranch, LLC (collectively, the “Debtors”), as debtors and debtors in possession in the above-captioned chapter 11 cases (the “Chapter 11 Cases”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Northern District of California (the “Bankruptcy Court”).

**PLEASE TAKE FURTHER NOTICE** that on March 29, 2024, the Debtors filed the *Debtors’ Motion for Orders (I)(A) Authorizing and Approving Bid Procedures, (B) Approving Procedures Related to the Assumption of Certain Executory Contracts and Unexpired Leases, (C) Approving the Notice Procedures, (D) Authorizing Entry into One or More Stalking Horse Agreements, and (E) Setting a Date for the Sale Hearing; and (II) Authorizing and Approving (A) the Sale of Certain Assets Free and Clear of All Liens, Claims, Encumbrances, and Interests, (B) the Assumption and Assignment of Certain Contracts, and (C) Payment of Bid Protections, if Applicable* [Docket No. 136] (the “Sale Motion”). The Debtors seek, among other things, to sell all, substantially all, or a portion of their property (the “Property”) at an auction free and clear of all liens, claims, encumbrances and other interests, and to assume and assign certain leases and executory contracts in connection therewith, pursuant to sections 105(a), 363(b), 363(f), and 365 of the Bankruptcy Code.

**PLEASE TAKE FURTHER NOTICE** that the Bankruptcy Court has scheduled a hearing on the Motion for **April 26, 2024, at 10:00 a.m.** (Pacific Time), before the Honorable Dennis Montali, United States Bankruptcy Judge. Pursuant to the *Procedures for Noticing and Conducting Hearings in the San Francisco Division of the United States Bankruptcy Court for the*

1 *Northern District of California (effective September 1, 2023), the hearing shall be conducted by*  
2 **video or teleconference, and the Courtroom will be closed.** The Bankruptcy Court's website  
3 provides information regarding how to arrange an appearance at a video or telephonic hearing. If  
4 you have questions about how to participate in a video or telephonic hearing, you may contact the  
court by calling 888-821-7606 or by using the Live Chat feature on the Bankruptcy Court's website  
at [www.canb.uscourts.gov](http://www.canb.uscourts.gov).

5 **PLEASE TAKE FURTHER NOTICE** that copies of the pleadings in these  
6 Chapter 11 Cases can be viewed and/or obtained by: (i) accessing the Court's website at  
7 <http://www.canb.uscourts.gov>, (ii) contacting the Office of the Clerk of the Court at 450 Golden  
8 Gate Avenue., 5<sup>th</sup> Floor, San Francisco, California 94102, or (iii) from the Debtors' notice and  
claims agent as indicated above. Note that a PACER password is needed to access documents on  
the Court's website.

9 Dated: March 29, 2024

**KELLER BENVENUTTI KIM LLP**

By: /s/ Jane Kim

Jane Kim

*Attorneys for Debtors and Debtors in  
Possession*